

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. ) CRIMINAL NO. 04-10384-PBS  
DANIEL KAMEN, )  
Defendant. )

## **ASSENTED-TO MOTION FOR EXCLUDABLE TIME**

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant U.S. Attorney Paul R. Moore, and the defendant, DANIEL KAMEN, by and through his counsel, Peter Elikann, Esq., jointly move pursuant to United States Code §3161(h)(8)(A) that the period from July 28, 2005, the date after which an Interim Status Conference was held in this matter, up to and including September 9, 2005, the date on which a Final Status Conference is scheduled to be held, be excluded from computation under the Speedy Trial Act of the time within this case must be tried. As reasons therefore, the parties represent that this brief continuance is necessary so that the parties can continue to examine the evidence in this matter and explore possible resolution of the matter without going to trial. Therefore, it is in the interests of justice that the current motion be allowed.

WHEREFORE, the parties respectfully request that the Court enter a written order of excludable delay covering the period from July 28, 2005, through September 9, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Paul R. Moore  
Paul R. Moore  
Assistant U.S. Attorney

DANIEL KAMEN  
Defendant

By: /s/ Peter Elikann  
Peter Elikann, Esq.  
Counsel for DANIEL KAMEN

DATE: July 27, 2005